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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

SEP 2 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Petition of U S WEST Communications, ) CC Docket No. 97-172  
Inc. for a Declaratory Ruling Regarding )  
the Provision of National Directory )  
Assistance )

**COMMENTS OF SWBT, PACIFIC AND NEVADA ON U S WEST'S  
PETITION FOR DECLARATORY RULING**

Southwestern Bell Telephone Company (SWBT), Pacific Bell (Pacific) and Nevada Bell (Nevada) hereby file their Comments on U S West's Petition for Declaratory Ruling (Petition). SWBT, Pacific and Nevada support the Petition and agree that the provision of National Directory Assistance (National DA) is consistent with the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (Act). For all the reasons set forth in the Petition and these Comments, National DA is a permissible Bell Operating Company (BOC) service and the Commission should so declare.

1. End User Customers Benefit from National DA

Telecommunications services have become increasingly complex. Customers want and demand services which are easy to use. In the context of directory assistance (DA), customers are accustomed to dialing 411 to obtain DA listing information.<sup>1</sup> The Petition seeks a

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<sup>1</sup> In some areas, customers dial a code other than 411 to access local DA. While these Comments refer to the use of the 411 dial code, the Commission should rule that BOCs may offer National DA service to customers who have dialed the code they use to access local DA service.

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declaratory ruling that the law allows BOCs to provide National DA service, in which customers dial 411 and receive information regarding telephone numbers, including those numbers that may require placement of an interLATA telephone call. Allowing customers access to this information by using the 411 dial code benefits consumers and is in the public interest.

Area codes are being exhausted at an increasingly rapid rate and area code splits and overlays are occurring at an ever-quickenning pace. Because of this, many consumers cannot keep track of new area codes and are confused about how to reach family, friends and businesses who have been assigned new area codes but have not physically moved or changed telephone numbers. To reach desired parties, consumers are forced to call an operator to determine the correct area code and then make a second call to DA to obtain the correct telephone number. The problem of exhaustion of area codes should not place an additional burden upon consumers by requiring them to keep track of ever changing data. Consumers want and demand, and should be entitled to, simple telecommunications services. The provision of National DA over 411 eliminates this two step process and enables consumers simply to dial 411 to get the information they need. Shortening the steps the consumer must follow to obtain telephone number information is in the public interest and becomes essential in emergency situations.

2. The Act is Consistent with Provision of National DA

As set forth in the Petition, nothing in the Act restricts the information that BOCs can provide over 411 based on the caller's use of that information. The Commission has found that

the provision of “interLATA” information to end users by BOCs is an adjunct to basic,<sup>2</sup> not enhanced service.<sup>3</sup> Nothing in the Act prohibits the provision of DA services which are basic or adjunct to basic, on a centralized, interLATA basis.<sup>4</sup> Provision of the service on a “centralized basis” means that the BOC can structure National DA in the most efficient, cost-effective manner. The BOC in no way is required to structure National DA with the customer, operator and database all in one LATA. Centralization of operators and database(s) is permissible for National DA, as it is for the provision of local DA. Provision of National DA in this efficient, cost-effective way makes sense and clearly benefits consumers.

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<sup>2</sup>The FCC ruled that DirectLine Custom (DLC) was an “adjunct to basic service”. DLC allows customers access to SWBT and independent local exchange company listings in SWBT’s five-state territory. Memorandum Opinion and Order, In the Matter of Southwestern Bell Telephone Co., Petition for Waiver of Section 69.4(b) of the Commissions Rules, Revisions to Tariff FCC No. 68, Transmittal No. 1741, DA 90-838, rel. July 15, 1990.

<sup>3</sup>Petition, page 10-13; In the Matter of North American Telecommunications Association, Memorandum Opinion and Order, 101 FCC 2d 349, 359 para 24 (1985); In the Matter of Southwestern Bell Telephone Company Petition for Waiver of Section 69.4(b) of the Commission’s Rules, Revisions to Tariff F.C.C. No. 68, Memorandum Opinion and Order, 5 FCC Rcd. 3792,3793 para 13 (1990)

<sup>4</sup>Petition, page 13-14

For all the foregoing reasons, SWBT, Pacific and Nevada respectfully request that the Commission enter an Order granting the Petition and ruling that BOCs are authorized to offer National DA by means of interLATA official services circuits and over the 411 code.

Respectfully submitted,

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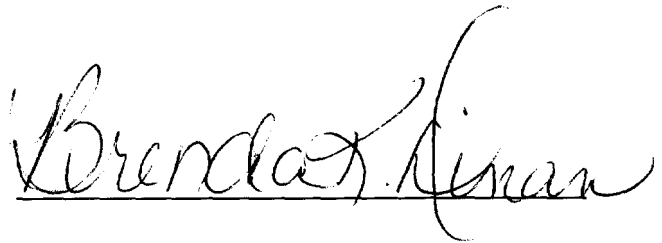
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September 2, 1997

**CERTIFICATE OF SERVICE**

I, Brenda K. Dinan, hereby certify that the Comments of Southwestern Bell Telephone Company and Pacific Bell on U S West's Petition for Declaratory Ruling, has been served September 2, 1997, to the Parties of Record.

A handwritten signature in cursive script, reading "Brenda K. Dinan", written over a horizontal line.

Brenda K. Dinan

September 2, 1997

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